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By ECF

June 18, 2024

Hon. LaShann DeArcy Hall  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Ronald Washington, No. 20 Cr. 305 (LDH)***

Dear Judge DeArcy Hall:

Per your Honor's directive, we write on behalf of both defendants to provide further information about counsels' availability for oral argument on the pending Rule 29(c) and Rule 33 motions. Since the government has already filed its letter, we apologize that we are not able to present the Court with a joint letter.

As an initial matter, on June 13<sup>th</sup>, we asked your Honor for an adjournment of the oral argument primarily because two of the defense lawyers had urgent and unforeseen health-related family matters which required their attention. Defense counsel for both defendants will make themselves available from now through July 22<sup>nd</sup>, except of July 5, 11 and 19. We respectfully object to delaying oral argument until August or later.

The Court's attention to this matter is appreciated.

Respectfully submitted,

*Susan G. Kellman*

Susan G. Kellman  
Ezra Spilke  
Jacqueline Cistaro

cc: All counsel of record, by ECF